

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION

In re:
Grand Jury Proceedings

Case Number: Misc. No. 24-936

MOTION FOR LEAVE TO AMEND MOTIONS
AND TO SET A BRIEFING SCHEDULE

Ms. Collins, through counsel, hereby moves for leave to amend her simultaneously-filed Objection to Immunity Order and Motion for Hearing Thereon, as well as all additional forthcoming motions that will be filed before her grand jury appearance today (Tuesday, March 18), and moves that this Court set a briefing schedule in this matter. In support, Ms. Collins states the following:

1. Ms. Collins has been subpoenaed to testify before the grand jury in the above-captioned matter.
2. Last week, Ms. Collins retained the undersigned counsel.
3. On this timeframe, and balancing substantial other obligations (including a jurisdictional appellate deadline in a felony criminal case), counsel has endeavored to diligently research and brief the matters necessary to defend Ms. Collins' rights in this proceeding.
4. Counsel is simultaneously filing a preliminary Objection to Immunity Order and Motion for Hearing Thereon and intends to file additional motions, including a Motion to Quash, prior to Ms. Collins' appearance before the grand jury.

5. However, additional time is necessary to allow for all relevant matters to be investigated and briefed thoroughly.
6. For the foregoing reasons, counsel respectfully requests that this Court set a briefing schedule in this matter and defer Ms. Collins' appearance before the grand jury until all outstanding motions are resolved.
7. Counsel is simultaneously filing a proposed order setting forth a proposed briefing schedule.
8. Counsel has conferred with AUSA Vasquez Schmitt, who opposes the instant request.

Respectfully Submitted,

MICAIAH COLLINS

By: /s/ Jonathan Sidney
Jonathan Sidney

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CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2025, I filed the foregoing Motion for Leave to Amend Motions and to Set a Briefing Schedule with the Clerk of the Court via email to intake2_pawd@pawd.uscourts.gov and simultaneously served Assistant United States Attorney Nicole Vasquez Schmitt by carbon copy to nicole.vasquez.schmitt@usdoj.gov.

/s/ Jonathan Sidney
Jonathan Sidney